

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY,

Debtor

PROMESA  
TITLE III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates only to HTA  
Teresa Vizcarrondo Toro &  
Adrián Mercado Jiménez  
And their conjugal society**

**ADDEMDUM TO MOTION REQUESTING PAYMENT OF SEVERANCE DAMAGES**

**COMES NOW**, respondents, **ADRIÁN MERCADO JIMÉNEZ, TERESA VIZCARRONDO TORO, and their CONJUGAL SOCIETY**, and very respectfully allege and pray:

1. That on February 23, 2023 herein appearing party filed Motion Requesting Payment of Severance Damages (Case Number 17-03283-LTS9, Docket Entry #23621).

2. That on February 25 herein appearing party tried to enter his property mentioned in the filed motion.

3. That the condition at the entrance to the so called "'access" is shown in the Exhibits I, II & III.

4. That said picture is almost identical to the one taken in 2018 showing the condition of the entrance, said picture is as Exhibit in the Corrected Response filed on June 23, 2022.

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5. That herein appearing party will wait for the response of HTA on March 10 to reply.

**WHEREFORE**, it is respectfully requested that this motion be GRANTED and that this present condition of the entrance to the so called "access" be noted.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this 1 day of March 2023.



**ADRIÁN MERCADO**

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**CERTIFY** that copy of this motion has been sent by Certified and Return Receipt Mail on this date to: 1) **Clerk's Office**, United States District Court, 150 Chardon Ave., Federal Building, San Juan, Puerto Rico 00918; 2) **Attorneys for the Financial Oversight and Management Board as representative for the Debtor, Martin J. Bienenstock and Brian S. Rosen, PROSKAUER ROSE LLP**, Eleven Time Square, New York, New York 10036; 3) **Co-Attorneys for the Financial Oversight and Management Board as representative for the Debtor, Hermann D. Bauer, O'NEILL & BORGES LLC** 250 Muñoz Rivera Ave. Suite 800, San Juan, PR 00918-1813 4) **Counsel for the Creditors' Committee, PAUL HASTINGS LLP, Luis A. Despina**, 200 Park Avenue, New York, New York 10166; 5) **Commonwealth of Puerto Rico, Claims Processing Center c/o Kroll Restructuring Administration LLC**, 850 Third Avenue, Suite 412, Brooklyn, NY 11232; 6) **Bankruptcy Court Puerto Rico, Case MMLID: 168560 EPOC ID: 1703283007322**, José V. Toledo Federal Building, 300 Recinto St. S Ste 100, San Juan, PR 00901-1964.